

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS DAVID WILLIAMS  
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORIES  
(NAA/USPS-T1-1 THROUGH 14)**

The United States Postal Service hereby files the responses of witness David Williams to the above-listed interrogatories of the Newspaper Association of America dated January 11, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY**

**NAA/USPS-T1-1** Assuming that service standards for Periodicals Mail are revised as described in your testimony, please describe what service standard would apply to a Within-County flats mailing entered at a Destination Delivery Unit in carrier-walk sequenced order and in compliance with all relevant mail preparation requirements.

**RESPONSE**

Overnight. See the proposed service standard for DDU Periodicals in Library

Reference USPS-LR-N2012-1/7 at pages 22 and 30.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY**

**NAA/USPS-T1-2** Under what circumstances could the mailing described in NAA/USPS-T1-1 receive overnight delivery?

**RESPONSE**

If its meets applicable preparation requirements, is entered by the applicable DDU Critical Entry Time, and is processed and delivered in accordance with the applicable operating plan.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY**

**NAA/USPS-T1-3** Assuming that service standards for Periodicals Mail are revised as described in your testimony, please describe what service standard would apply to an Outside-County flats mailing entered at the Destination Delivery Unit in carrier-walk sequenced order and in compliance with all relevant mail preparation requirements.

**RESPONSE**

Overnight. See the proposed service standard for DDU Periodicals in Library

Reference USPS-LR-N2012-1/7 at pages 22 and 30.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY**

**NAA/USPS-T1-4** Under what circumstances could the mailing described in  
NAA/USPS-T1-3 receive overnight delivery?

**RESPONSE**

If its meets applicable preparation requirements, is entered by the applicable  
DDU Critical Entry Time, and is processed and delivered in accordance with the  
applicable operating plan.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY**

**NAA/USPS-T1-5** Assuming that service standards for Periodicals Mail are revised as described in your testimony, are there any circumstances in which a Within County Periodicals mailing that properly claims an SCF Destination Entry Discount could receive overnight delivery? If so, please explain those circumstances.

**RESPONSE**

Yes, if its meets applicable preparation requirements, is entered by the applicable BMEU Critical Acceptance Time or SCF Critical Entry Time, and is processed and delivered in accordance with the applicable operating plan. See the proposed service standard for DSCF Periodicals in Library Reference USPS-LR-N2012-1/7 at pages 22 and 30.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
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**NAA/USPS-T1-6** Assuming that service standards for Periodicals Mail are revised as described in your testimony, are there any circumstances in which an Outside-County Periodicals mailing that properly claims an SCF Destination Entry Discount could receive overnight delivery? If so, please explain those circumstances.

**RESPONSE**

Yes. If its meets applicable preparation requirements, is entered by the applicable BMEU Critical Acceptance Time or SCF Critical Entry Time, and is processed and delivered in accordance with the applicable operating plan. See the proposed service standard for DSCF Periodicals in Library Reference USPS-LR-N2012-1/7 at pages 22 and 30.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
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**NAA/USPS-T1-7** Assuming that service standards for Periodicals Mail are revised as described in your testimony, under what circumstances could a Within County Periodicals mailing entered at a Business Mail Entry Unit receive overnight delivery?

**RESPONSE**

Under circumstances where it qualified for such treatment as DDU or DSCF entry mail as described at pages 22 and 30 of Library Reference USPS-LR-N2012-1/7, meets applicable preparation requirements, is entered at a BMEU by the applicable Critical Acceptance Time or at a DDU or SCF by the applicable Critical Entry Time, and is processed and delivered in accordance with the applicable operating plan.



**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
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**NAA/USPS-T1-8:** Assuming that service standards for Periodicals Mail are revised as described in your testimony, under what circumstances could an Outside-County Periodicals mailing entered at a Business Mail Entry Unit receive overnight delivery?

**RESPONSE**

Under circumstances where it qualified for such treatment as DSCF entry mail as described at page 22 of Library Reference USPS-LR-N2012-1/7, meets applicable preparation requirements, is entered at a BMEU by the applicable Critical Acceptance Time or at the SCF by the applicable Critical Entry Time, and is processed and delivered in accordance with the applicable operating plan

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
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**NAA/USPS-T1-9:** Would the Periodicals mailings described in your responses to NAA/USPS-T1-7 and NAA/USPS-T1-8 be eligible for destination entry discounts? If yes, please identify what destination entry discounts would be available.

The pricing of postal products is outside the scope of my testimony. There are no price changes associated with the request in this docket. I am informed that, in the future network, mail that meets the requirements for DSCF entry will pay DSCF prices and that mail meeting the applicable DDU entry requirements will pay DDU prices.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY**

**NAA/USPS-T1-10** Assuming that service standards are revised as described in your testimony, would there be any changes to the service standard currently applicable to a Standard High-Density flats mailing entered at a Destination DDU? If so, please describe the explain those circumstances.

**RESPONSE**

No change in the day range is proposed. The proposed DDU Standard Mail service standard is reflected in Library Reference USPS-LR-N2012-1/7 at pages 25 and 30.

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**NAA/USPS-T1-11** Assuming that service standards are revised as described in your testimony, would there be any changes to the service standard currently applicable to a Standard High-Density flats mailing entered at a Destination SCF? If so, please describe the explain those circumstances.

**RESPONSE**

No change in the day range is proposed. The proposed DSCF Standard Mail service standard is reflected in Library Reference USPS-LR-N2012-1/7 at pages 25 and 30.

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**NAA/USPS-T1-12** Assuming that service standards are revised as described in your testimony, would there be any changes to the service standard currently applicable to a Standard Saturation flats mailing entered at a Destination DDU? If so, please describe the explain those circumstances.

**RESPONSE**

No change in the day range is proposed. The proposed DDU Standard Mail service standard is reflected in Library Reference USPS-LR-N2012-1/7 at pages 25 and 30.

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**NAA/USPS-T1-13** Assuming that service standards are revised as described in your testimony, would there be any changes to the service standard currently applicable to a Standard Saturation flats mailing entered at a Destination SCF? If so, please describe the explain those circumstances.

**RESPONSE**

No change in the day range is proposed. The proposed DSCF Standard Mail service standard is reflected in Library Reference USPS-LR-N2012-1/7 at pages 25 and 30.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
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**NAA/USPS-T1-14** Please refer to page 24, line 20 of your testimony. Please confirm that you intended to use the word “not” between “locations” and “requiring.” If you cannot confirm, please explain why not.

**RESPONSE**

Confirmed. A correction will be filed.